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*Counsel to Plaintiff, Robert Michaelson, in his capacity as  
Trustee of the International Shipholding GUC Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

INTERNATIONAL SHIPHOLDING  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

ROBERT MICHAELSON, in his capacity as  
TRUSTEE OF THE INTERNATIONAL  
SHIPHOLDING GUC TRUST,

Plaintiff,

v.

FAM MARINE SERVICES, INC.,

Defendant.

Chapter 11

Case No. 16-12220 (SMB)

(Jointly Administered)

Adv. Proc. No. 18-01596 (SMB)

**STIPULATION ADJOURNING HEARING DATE**

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: International Shipholding Corporation (9662); Enterprise Ship Co. (9059); Sulphur Carriers, Inc. (8965); Central Gulf Lines, Inc. (8979); Coastal Carriers, Inc. (6278); Waterman Steamship Corporation (0640); N.W. Johnsen & Co., Inc. (8006); LMS Shipmanagement, Inc. (0660); U.S. United Ocean Services, LLC (1160); Mary Ann Hudson, LLC (8478); Sheila McDevitt, LLC (8380); Tower LLC (6755); Frascati Shops, Inc. (7875); Gulf South Shipping PTE LTD (8628); LCI Shipholdings, Inc. (8094); Dry Bulk Australia LTD (5383); Dry Bulk Americas LTD (6494); and Marco Shipping Company PTE LTD (4570).

Plaintiff, Robert Michaelson, in his capacity as Trustee of the International Shipholding GUC Trust (the “GUC Trustee” or “Plaintiff”) and Defendant FAM Marine Services, Inc. (“Defendant”), by and through their undersigned counsel of record, stipulate as follows:

**RECITALS.**

WHEREAS, on November 6, 2018, Plaintiff filed his *Motion for Default Judgment Against FAM Marine Services, Inc.* [Docket No. 9] (the “Motion”) seeking a default judgment against the Defendant in the amount of \$150,103.00 plus judgment interest at the federal judgment rate from the date of judgment until paid in full;

WHEREAS, the deadline for the Defendant to respond to the Motion is December 4, 2018 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

WHEREAS, a hearing on the Motion has been scheduled for December 11, 2018 at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”);

WHEREAS, subject to the approval of the United States Bankruptcy Court for the Southern District of New York, the parties have agreed to adjourn the Response Deadline from December 4, 2018 to December 27, 2018 at 4:00 p.m. (prevailing Eastern Time) and to adjourn the Hearing in this Adversary Proceeding from December 11, 2018 to January 3, 2019 at 10:00 AM.

**NOW AND THEREFORE, IT IS HEREBY STIPULATED AND AGREED:**

1. The Response Deadline is adjourned to December 27, 2018 at 4:00 p.m. (prevailing Eastern Time).
2. The Hearing on the Motion is adjourned until January 3, 2019 at 10:00 AM.
3. The execution, delivery, and effectiveness of this Stipulation shall not operate as a waiver of any right, power, or remedy of any party.

4. Each person who executes this Stipulation represents that he or she is duly authorized to execute this Stipulation on behalf of the respective Parties hereto and that each such party has full knowledge and has consented to this Stipulation.

5. This Stipulation may be executed in one or more counterparts, any of which may be transmitted by facsimile or electronic transmission, and each of which shall be deemed an original, but all of which together shall constitute one and the same document.

Dated: December 5, 2018

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Beth E. Levine

Beth E. Levine

Andrew W. Caine (admitted *pro hac vice*)

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*Counsel to Plaintiff, Robert Michaelson, in his capacity  
as Trustee of the International Shipholding GUC Trust*

Dated: December 5, 2018

COLLIER WALSH LLP

/s/Ellen E. McGlynn

Ellen E. McGlynn (*pro hac vice* application  
forthcoming)

Joseph A. Walsh II (*pro hac vice* application  
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*Counsel to Defendant, FAM Marine Services, Inc.*

**SO ORDERED**

**Dated: December 6, 2018**  
**New York, New York**

**/s/ STUART M. BERNSTEIN**

**HONORABLE STUART M. BERNSTEIN**  
**United States Bankruptcy Judge**